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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

SMASH TECHNOLOGY, LLC, a Nevada
limited liability company; and MICHAEL
ALEXANDER, an individual;

Plaintiffs,

vs.

SMASH SOLUTIONS, LLC, a Delaware
limited liability company; JERRY “J.J.”
ULRICH, an individual; SMASH
INNOVATIONS, LLC, a Wyoming limited
liability company; and FERACODE, LLC, a
Utah limited liability company,

Defendants.

**Defendants and Counterclaim Plaintiffs’
DUCivR 26-1(b)(1)(A)(i) Designations**

Civil No. 2:19-cv-00105-TC-JCB

Judge Tena Campbell

Magistrate Judge Jared C. Bennett

SMASH SOLUTIONS, LLC, a Delaware
limited liability company; JERRY “J.J.”
ULRICH, an individual; and JOHN DOES 1-3;

Counterclaim Plaintiffs,

vs.

SMASH TECHNOLOGY, LLC, a Nevada
limited liability company; and MICHAEL
ALEXANDER, an individual;

Counterclaim Defendants.

Pursuant to Rule 26-1(b)(1)(A)(i) of the District of Utah Rules of Civil Procedure, Defendants and Counterclaim Plaintiffs Smash Solutions, LLC, Jerry Ulrich, and Smash Innovations, LLC, by and through their counsel of record Matthew C. Barneck, Zachary E. Peterson, and Kristina H. Ruedas, RICHARDS BRANDT MILLER NELSON, hereby submit their disclosures of expert testimony, which were served upon Plaintiffs and Counterclaim Defendants on December 31, 2020, as follows:

Retained Expert Witnesses

1. **Derk G. Rasmussen**, 136 E South Temple, Suite 1000, Salt Lake City, Utah 84111, (801) 531-0400. Mr. Rasmussen is a forensic accountant.

Non-Retained Expert Witnesses

1. **Jerry Ulrich**, c/o Matthew C. Barneck, Zachary E. Peterson, Kristina H. Ruedas, 111 East Broadway, Suite 400, Salt Lake City, Utah 84111, (801) 531-2000. Mr. Ulrich is an expert in software development and cryptocurrency.

* * * *

Defendants and Counterclaim Plaintiffs reserve the right to supplement, modify, or amend any disclosure or opinions of any disclosed expert witness upon the receipt of further information acquired or discovered in this matter pursuant to ongoing discovery, including, but not limited to, Plaintiffs' expert disclosures, depositions, or amendments to pleadings. Specifically, Defendants reserve the right to present a report and/or present expert testimony in the event that Plaintiffs come forward with any admissible evidence or expert witness opinions or a report. Defendants and Counterclaim Plaintiffs also reserve the right to amend this disclosure according to any amended scheduling order by stipulation among the parties or in accordance with any motion for additional time to submit expert witness disclosures or reports.

Defendants and Counterclaim Plaintiffs further reserve the right to supplement or amend this disclosure if additional witnesses are identified. Defendants and Counterclaim Plaintiffs further reserve the right to call any witness in rebuttal to any testimony solicited by any witness called by Plaintiffs.

DATED this 30th day of December, 2020.

RICHARDS BRANDT MILLER NELSON

s/ Kristina H. Ruedas
MATTHEW C. BARNECK
ZACHARY E. PETERSON
KRISTINA H. RUEDAS
*Attorneys for Smash Solutions, LLC,
Smash Innovations, LLC, and Jerry J. Ulrich*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of December, 2020, I electronically filed the foregoing **Defendants and Counterclaim Plaintiffs' Expert Witness Disclosures** with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

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/s/ Danielle Koons

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